1 MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 2 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016 3 AKERMAN LLP 1635 Village Center Circle, Suite 200 4 Las Vegas, Nevada 89134 (702) 634-5000 Telephone: 5 Facsimile: (702) 380-8572 Email: melanie.morgan@akerman.com Email: scott.lachman@akerman.com 6 7 Attorneys for Bank of America, N.A. 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 1635 VILLAGE CENTER CIRCLE, SUITE 200 LAS VEGAS, NEVADA 89134 TEL.: (702) 634-5000 – FAX: (702) 380-8572 11 12 BIG ROCK ASSETS MANAGEMENTS, LLC, Case No. 2:22-cv-01543-APG-EJY **AKERMAN LLP** a Nevada limited liability company, 13 Plaintiff. 14 **STIPULATION AND ORDER** 15 v. EXTENSION OF TIME TO RESPOND TO **COMPLAINT** 16 **NATIONAL DEFAULT** SERVICING CORPORATION, an Arizona corporation; (SECOND REQUEST) 17 BANK OF AMERICA, N.A., a national banking association; DOES I through X; and ROE 18 BUSINESS ENTITIES I through X, inclusive, 19 Defendants. 20 21 Plaintiff Big Rock Assets Management, LLC and defendant Bank of America, N.A. (BANA) 22 23 stipulate that BANA shall have an additional twenty-one (21) days, up to and including January 23, 2023, to file its response to the complaint, which is currently due on January 2, 2023. ECF No. 10. 24 Good cause exists to grant the requested extension. BANA is requesting additional time due 25 to ongoing settlement discussions and the holiday season. BANA also needs additional time to 26 confer with Fannie Mae and FHFA regarding loan, settlement, and the response to the complaint. 27

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This is the parties' second request for an extension of this deadline, and is not intended to cause any delay or prejudice to any party.

DATED this 19th day of December, 2022.

AKERMAN LLP

Nevada Bar No. 8215

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Las Vegas, NV 89134

/s/ Scott R. Lachman MELANIE D. MORGAN, ESQ.

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/s/ Joseph Y. Hong

JOSEPH Y. HONG, ESQ. Nevada Bar No. 5995 1980 Festival Plaza Drive, Suite 650 Las Vegas, NV 89135

Attorney for Big Rock Assets Management, LLC

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE 2:22-cv-01543-APG-EJY

DATED: December 19, 2022

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